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Rcv'd by: gab

USDC- GREENBELT  
25 JUL 2 PM 2025

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Sherrall Randall

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-  
Bozzuto Management  
Company

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 1:25-cv-2147

(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address

Sherrall RANDALL  
PO BOX 1269  
Ellicott City Howard County  
MD, 21041  
410-315-5151  
Sherrallrandall@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name  
 Job or Title  
 (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address  
 (if known)

Bozzuto Management Company  
6406 Ivy Lane Suite 700  
Greenbelt, Prince's George's County  
Maryland, 20770  
410-840-1161

Defendant No. 2

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

*(If there are more than four defendants, attach an additional page  
providing the same information for each additional defendant.)*

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fair Housing Act (42 U.S.C. ...), Americans with Disabilities Act, Rehabilitation Act Section 504, Civil Rights Conspiracy, Due Process

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Bozzuto Management Company, is incorporated under the laws of the State of (name) MARYLAND, and has its principal place of business in the State of (name) Maryland. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The amount in controversy exceeds \$75,000 because Plaintiff suffered ongoing disability discrimination, was denied a reasonable accommodation, and was forcibly evicted despite providing medical documentation. Defendant subjected Plaintiff to police involvement and falsely claimed she was legally banned from Bozzuto properties without providing notice or an opportunity to challenge the ban. Plaintiff and children were forced to live in a homeless shelter for 5 months. Causing further trauma and instability to the entire family while Plaintiff was actively participating in mental health treatment. Defendants actions significantly exacerbated her PTSD and mental health symptoms. Defendants failure to enforce their alleged legal ban on the guest, who continue access to the property endangered Plaintiff PTSD. Ricardo Barbour and family. Seeking ~~perpet~~ Plaintiff is seeking punitive damages for emotional distress, trauma, civil rights violations, long →

term harm caused by being displaced, retraumatized, and denied basic protections while actively receiving mental health treatment.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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Plaintiff Sherrall Randall is a person with a diagnosed disability, PTSD, who lived at Azure Oxford Square Apts, owned and managed by BOZZUTO Management Company. In 2023 Bozzuto claimed to have issued a legal ban against OCT a known safety threat, Ricardo Barbour. Despite this Mr. Barbour continued access the building where plaintiff resided. Plaintiff personally observed and video recorded Mr. Barbour on the premises, including on August 18, 2024. Due to the ongoing threat and worsening PTSD symptoms, Plaintiff submitted multiple written request to Bozzuto's legal team via email, requesting to be reasonably accommodated through a unit transfer. She also emailed a copy of her PTSD diagnosis in Nov. 2024. Bozzuto denied the request to move to a different unit and terminated her lease. Plaintiff and her children were forced to vacate on Dec 7, 2024, where they remained and entered a homeless shelter, where they remained for 5 months. Plaintiff was actively receiving trauma-focused mental health treatment during Augst 2024 - present. In Feb 2025, after receiving NO response to prior emails, Plaintiff went to Bozzuto's corporate office to request a copy of her move out statement. ~~On~~ The following day on Feb 4, 2025, Bozzuto's attorney, James Braggioni Esq., notified Plaintiff via email that she was "legally banned" from Bozzuto properties, and request to provide a copy of this "legal ban" at Plaintiff request.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Plaintiff seeks \$0 million in compensatory and punitive damages for the emotional distress, trauma, displacement, and civil rights violations caused by Bozzuto discriminatory, retaliatory and negligent conduct. Plaintiff and her children were forced into a homeless shelter, and her mental health was severely impacted during active mental health treatment. Plaintiff, also requests injunctive relief to prevent Bozzuto from continuing to harm tenants through misuse of bans, failure to accommodate disabilities, and misrepresentation to state agencies.

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Plaintiff emailed multiple follow-ups request for a copy of the alleged "legal ban", which Bozzuto never produced. When Plaintiff filed a housing discrimination complaint with HUD and MCCR - Maryland Commission on Civil Rights, Bozzuto told the state agency that the ban was only "informal".

In April 2025, MR. Barbour was incarcerated for domestic violence. He has since made recorded threats against Plaintiff from the Anne Arundel County jail, after she witnessed ~~an~~ a violence ~~an~~ attack by Ricardo Barbour on Kayla Collins - a previous Bozzuto tenant. ~~An~~ Plaintiff once lived in the same building with as Ricardo. Frequently came to visit despite Bozzuto alleged ban on Ricardo Barbour.

Bozzuto's failure to enforce its own alledge legal Ban allowed Mr. Barbour ~~to~~ continued access to the Azure property, exposing Plaintiff to further trauma and fear.

Bozzuto's actions - includes denial of written accommodation request, ~~an~~ eviction, police involvement, misrepresentation of a legal ban, failure to Plaintiff right to due process, and failure to protect - caused Plaintiff and her children emotional harm, displacement, and worsening her disability.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 2<sup>nd</sup>, 2025

Signature of Plaintiff

Printed Name of Plaintiff



Sherrall Randall

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

Email Address \_\_\_\_\_